

Dec 7, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Aviacomm adaptive radios operating in TVWS, ET Docket Nos. 04-186

Dear Ms. Dortch:

On Dec 6, 2011, I met with Julius Knapp and Alan Stillwell, Chief and Deputy Chief, respectively of the Office of Engineering and Technology.

The purpose of this meeting was to highlight to the OET about technology break through made in the development of adaptive radios by Aviacomm, Incorporated, a wireless company based in Santa Clara, CA. I discussed how our devices can meet the “out of band emission limit” mandated by the FCC for operations in the TVWS. The diagram below was sent to Julius Knapp and forwarded to Alan Stillwell in a separate document

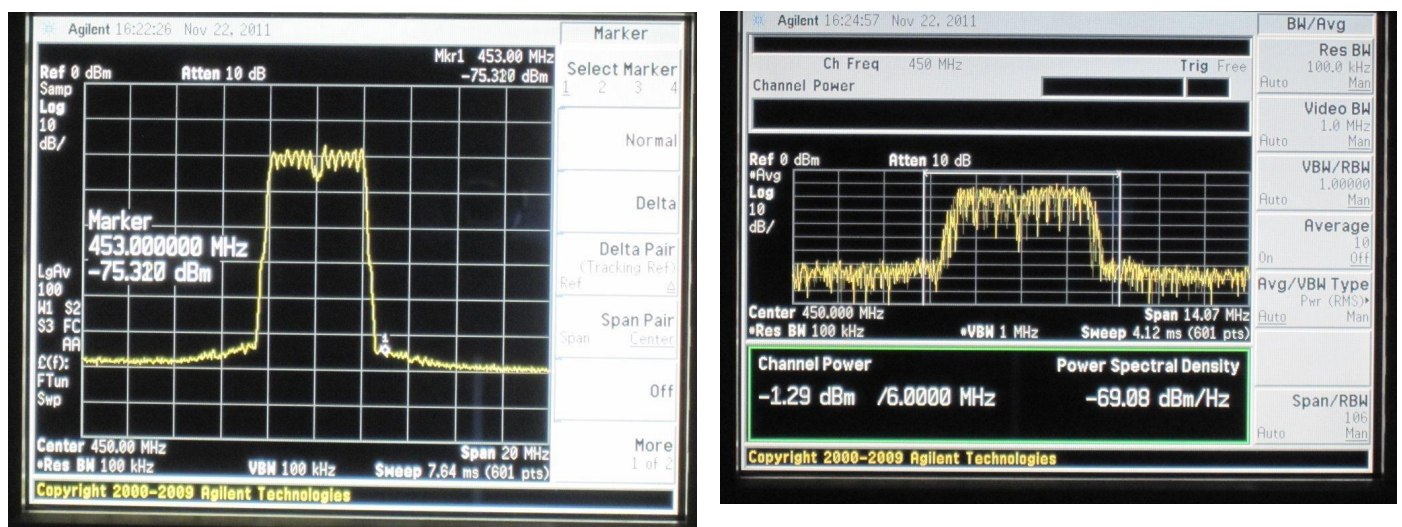


Figure 4. Adjacent channel output power measured in 100 kHz (-75.3 dBm) & 6MHz in-band power (-1.29dBm)

Furthermore, I discussed how our technology was developed in a form factor that can be made pervasive w/ low cost and high volume technology. Our radio devices can compete in power and size with lower end Zigbee and WiFi radios, but it has even better linearity compared to the LTE standard, 11dB greater.

The radio also has one further attractive dimension, which is its ability to operate from 300MHz to 3GHz range, essentially a wide band radio, ideal for new applications in LTE, WiFi and Smart Grid. We are sampling our products today to our customers, and will begin production in 2012'Q1 timeframe.

I iterated to Julius and Alan that Aviacomm is interested in the advancement of the TVWS. It places our solution in an attractive position with its linearity performance coupled with wideband frequency to support the



TVWS channels. We remain concerned, however, as to the long term viability and eventual penetration into the market. We look forward to more positive progress to be announced by Congress.

Beyond the TVWS, Aviacomm is interested to work w/ the FCC on other bands that will require similar out of band emissions limits as the TVWS. We briefly discussed the need for such in the 2.3GHz band. We would like to pursue discussions with parties needing assistance in meeting the FCC requirements.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket, 04-186. If you require any additional information, please contact the undersigned.

Sincerely yours,

/s/ Luis Ancajas

Luis Ancajas  
Sr. Vice President of Marketing, Aviacomm, Incorporated